

of the enhancement plan proposal developed by GRIC-CRMP, it is believed that the potential for adverse effects on these two sites under Criterion A will be eliminated. SHPO and GRIC-THPO concurred with the adequacy of the TCP enhancement plan proposal and that its implementation would eliminate adverse effects on Villa Buena and Pueblo del Alamo under Criterion A (Lewis [GRIC-THPO] to Petty [FHWA] October 22, 2012; Jacobs [SHPO] to Petty [FHWA] October 25, 2012).

Based on the above discussion, FHWA and GRIC have agreed that the proposed South Mountain Freeway would adversely affect those characteristics that contribute to the NRHP eligibility of the South Mountains TCP under Criteria A and B, and that the project would not adversely affect the characteristics that contribute to the NRHP eligibility of the Villa Buena, Pueblo del Alamo, AZ T:12:112 (ASM), and AZ T:12:198 (ASM) TCPs under Criterion A. Furthermore, FHWA has determined that a finding of “adverse effect” for the overall project remains appropriate.

Please review the information provided in this letter and the enclosed technical summary report. If you agree with the adequacy of the report and FHWA’s determinations of project effect, NRHP eligibility, and management recommendations, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact Linda Davis at 602-712-8636 or at ldavis2@azdot.gov.

Sincerely yours,


for Karla S. Petty
Division Administrator

_____ Signature for Hualapai Tribe Concurrence NH-202-D(ADY)	_____ Date
--	---------------

Enclosures

cc:
Loretta Jackson-Kelly, Tribal Historic Preservation Officer, Office of Cultural Resources, P.O. Box 310, Peach Springs, AZ 86434 (with enclosure)



ARIZONA DIVISION

4000 North Central Avenue
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January 31, 2013

In Reply Refer To:
NH-202-D(ADY)
HOP-AZ

NH-202-D(ADY)
TRACS No. 202L MA 054 H5764 01C
202L, South Mountain Freeway, DCR and EIS
Continuing Section 106 Consultation
Traditional Cultural Properties

Mr. Manual Savala, Chairman
Kaibab Band of Paiute Indians
HC 65, Box 2, Tribal Affairs Bld.
Fredonia, Arizona 86022

Dear Chairman Savala:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are continuing technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS and Location/Design Concept Report project. The EIS addresses alternative alignments for the proposed South Mountain Freeway, which would extend around the southern side of South Mountains from Interstate 10 (I-10) in west Chandler to I-10 in west Phoenix. The project would be built entirely on new right-of-way (ROW). As this project employs federal funds, it is considered an undertaking subject to Section 106 review. Because alternatives are still under development, land ownership of the project area is not yet known.

In accordance with the National Historic Preservation Act (36 CFR 800.4), which requires federal agencies to take into account the effects of their undertakings on historic properties, FHWA and ADOT have been performing cultural resources studies and consultations with Native American tribes to identify concerns regarding historic properties of traditional, religious, cultural, or historic importance. In prior consultation, the Gila River Indian Community (GRIC) expressed concern regarding the effects of the project on several traditional cultural properties (TCPs). The other southern tribes, Ak-Chin Indian Community, the Tohono O’odham Nation, and the Salt River Pima-Maricopa Indian Community, have deferred to GRIC to take the lead in Section 106 consultation regarding the TCPs. In response, FHWA and ADOT have facilitated a continuing open dialogue with GRIC’s Cultural Resources Management Program (GRIC-CRMP) and Tribal Historic Preservation Office (GRIC-THPO) regarding the identification and evaluation of TCPs as they pertain to the South Mountain Freeway project. As a result of these discussions, GRIC has identified five TCPs that could be affected by construction of the South

Mountain Freeway and has developed treatment plans to mitigate and/or eliminate potential adverse effects that could result from the undertaking.

To protect confidential information associated with the TCPs, the evaluation reports and treatment plans have been provided to only SHPO and GRIC-THPO. Information regarding the identification, evaluation, and treatment of the TCPs is being provided to other consulting parties in a technical summary report entitled *Traditional Cultural Property Evaluations for the 202L, South Mountain Transportation Corridor EIS & L/DCR Project, Maricopa County, Arizona* (HDR 2012), which is enclosed for your review and comment. This letter provides a summary of the TCP consultation for the project.

Consulting parties receiving the TCP technical summary include the Bureau of Indian Affairs and City of Phoenix, who have jurisdiction over the resources, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribes, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Nation, the San Juan Southern Paiute, the Tohono O’odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, and the Yavapai-Apache Nation.

During the initial Class III survey for the project, GRIC-CRMP identified ten properties as places of cultural importance that could potentially qualify as eligible for listing on the National Register of Historic Places (NRHP) as TCPs: the South Mountains; two prehistoric Hohokam village sites, AZ T:12:9 (ASM) (Villa Buena) and AZ T:12:52 (ASM) (Pueblo del Alamo); two petroglyph sites, AZ T:12:198 (ASM) and AZ T:12:208 (ASM); four trail sites, AZ T:12:197 (ASM), AZ T:12:201 (ASM), AZ T:12:207 (ASM), and AZ T:12:211 (ASM); and one archaeological site with a shrine, AZ T:12:112 (ASM). The report, entitled *A Class III Cultural Resource Survey of Five Alternative Alignments in the South Mountain Freeway Corridor Study Area, Maricopa County, Arizona* (Darling 2005), was provided in prior consultation.

At the request of FHWA and ADOT, HDR Engineering, Inc. (HDR), performed an NRHP evaluation of the ten potential TCPs. The results were provided in a report titled *An Evaluation of Traditional Cultural Properties for the 202L, South Mountain Transportation Corridor EIS & L/DCR Project, Maricopa County, Arizona* (Brodbeck 2012). To protect confidential information associated with TCPs, the report was sent to only SHPO and GRIC-THPO for review. Based on the results, and continuing discussion with GRIC-THPO and SHPO, FHWA determined that:

- the South Mountains were eligible for listing in the NRHP under Criteria A and B as a TCP
- AZ T:12:9 (ASM) (Villa Buena), AZ T:12:52 (ASM) (Pueblo del Alamo), AZ T:12:112 (ASM), and AZ T:12:198 (ASM) were eligible for listing in the NRHP under Criterion A as TCPs and under Criterion D as archaeological sites
- AZ T:12:197 (ASM) and AZ T:12:198 (ASM) were also NRHP-eligible under Criterion A as contributors to the South Mountains TCP

- AZ T:12:201 (ASM), AZ T:12:207 (ASM), AZ T:12:208 (ASM), and AZ T:12:211 (ASM) were eligible for listing in the NRHP under Criterion D as archaeological sites and not as TCPs

SHPO and GRIC-THPO concurred with FHWA’s eligibility determinations (Jacobs [SHPO] to Petty [FHWA] May 15, 2012; Lewis [GRIC-THPO] to Petty [FHWA] July 3, 2012).

Through ongoing Section 106 consultations, primarily through a series of discussions and meetings, FHWA, ADOT, and GRIC developed options for mitigating adverse effects on the TCPs. As a result of those discussions, avoidance alternatives were developed for two of the TCPs, a petroglyph site [AZ T:12:198 (ASM)] and a shrine site [AZ T:12:112 (ASM)]. They will now be avoided by project alternatives; therefore, there will be no direct impacts on these sites.

The South Mountains TCP cannot be avoided by project alternatives; therefore, a treatment plan that presents measures to mitigate potential adverse effects of the South Mountain Freeway project on the South Mountains TCP was developed by GRIC-CRMP entitled *South Mountain Freeway (SR 202L) Traditional Uses and Cultural Significance of Muhadagi Doag (South Mountain) Evaluation of Traditional Property and Adverse Effects of Transportation Corridor Development* (Darling 2009). SHPO and GRIC-THPO concurred with the adequacy of the South Mountain TCP mitigation plan (Jacobs [SHPO] to Petty [FHWA] May 15, 2012; Lewis [GRIC-THO] to Petty [FHWA] July 3, 2012).

Because it may not be possible to avoid Villa Buena and/or Pueblo del Alamo during freeway construction, FHWA proposed that an alternative strategy be adopted to prevent potential adverse effects to these two sites as they pertain to Criterion A of the NRHP. At the request of FHWA, GRIC-CRMP prepared a TCP enhancement plan proposal for the two sites, entitled *South Mountain Freeway (SR 202L) Traditional Cultural Property Enhancement and Management Planning for Villa Buena (AZ T:12:9 [ASM]) and Pueblo del Alamo (AZ T:12:52 [ASM])* (Darling and Loendorf 2012), which was provided to SHPO and GRIC-THPO for review and comment. This document proposes that upon completion of the EIS review process, the TCP enhancement plan be developed and implemented, which would ensure the following:

- preparation of the site(s) and people for anticipated ground disturbance include traditional religious activities, exhibits and outreach, tribal consultation, cultural sensitivity training, and the projection of equivalent sites and sacred landscapes
- development of Programmatic Solutions for preservation, restoration, and perpetuation of the roles of Villa Buena and Pueblo del Alamo in O’odham culture and history

Cultural (TCP) enhancement purposes to elevate O’odham knowledge and awareness of these two sites so that any negative impact on their “presence” in O’odham cultural and history—the loss of connections, or of place, in traditional culture—are addressed prior to, during, and after freeway construction, and as part of project planning. Enhancement does not address or replace requirements for data recovery pertaining to adverse effects on Villa Buena or Pueblo del Alamo with regard to their eligibility under Criterion D of the NRHP. However, through implementation

of the enhancement plan proposal developed by GRIC-CRMP, it is believed that the potential for adverse effects on these two sites under Criterion A will be eliminated. SHPO and GRIC-THPO concurred with the adequacy of the TCP enhancement plan proposal and that its implementation would eliminate adverse effects on Villa Buena and Pueblo del Alamo under Criterion A (Lewis [GRIC-THPO] to Petty [FHWA] October 22, 2012; Jacobs [SHPO] to Petty [FHWA] October 25, 2012).

Based on the above discussion, FHWA and GRIC have agreed that the proposed South Mountain Freeway would adversely affect those characteristics that contribute to the NRHP eligibility of the South Mountains TCP under Criteria A and B, and that the project would not adversely affect the characteristics that contribute to the NRHP eligibility of the Villa Buena, Pueblo del Alamo, AZ T:12:112 (ASM), and AZ T:12:198 (ASM) TCPs under Criterion A. Furthermore, FHWA has determined that a finding of “adverse effect” for the overall project remains appropriate.

Please review the information provided in this letter and the enclosed technical summary report. If you agree with the adequacy of the report and FHWA’s determinations of project effect, NRHP eligibility, and management recommendations, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact Linda Davis at 602-712-8636 or at ldavis2@azdot.gov.

Sincerely yours,



Karla S. Petty
Division Administrator

Signature for Kaibab Band of Paiute Indians Concurrence Date
NH-202-D(ADY)

Enclosure

cc:
Charley Bullets, Cultural Resources Director (with enclosure)



U.S. Department
of Transportation
**Federal Highway
Administration**

ARIZONA DIVISION

4000 North Central Avenue
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January 31, 2013

In Reply Refer To:
NH-202-D(ADY)
HOP-AZ

NH-202-D(ADY)
TRACS No. 202L MA 054 H5764 01C
202L, South Mountain Freeway, DCR and EIS
Continuing Section 106 Consultation
Traditional Cultural Properties

Dr. Alan Downer, Tribal Historic Preservation Officer
Historic Preservation Department
Navajo Nation
P.O. Box 4950
Window Rock, Arizona 86515

Dear Dr. Downer:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are continuing technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS and Location/Design Concept Report project. The EIS addresses alternative alignments for the proposed South Mountain Freeway, which would extend around the southern side of South Mountains from Interstate 10 (I-10) in west Chandler to I-10 in west Phoenix. The project would be built entirely on new right-of-way (ROW). As this project employs federal funds, it is considered an undertaking subject to Section 106 review. Because alternatives are still under development, land ownership of the project area is not yet known.

In accordance with the National Historic Preservation Act (36 CFR 800.4), which requires federal agencies to take into account the effects of their undertakings on historic properties, FHWA and ADOT have been performing cultural resources studies and consultations with Native American tribes to identify concerns regarding historic properties of traditional, religious, cultural, or historic importance. In prior consultation, the Gila River Indian Community (GRIC) expressed concern regarding the effects of the project on several traditional cultural properties (TCPs). The other southern tribes, Ak-Chin Indian Community, the Tohono O’odham Nation, and the Salt River Pima-Maricopa Indian Community, have deferred to GRIC to take the lead in Section 106 consultation regarding the TCPs. In response, FHWA and ADOT have facilitated a continuing open dialogue with GRIC’s Cultural Resources Management Program (GRIC-CRMP) and Tribal Historic Preservation Office (GRIC-THPO) regarding the identification and evaluation of TCPs as they pertain to the South Mountain Freeway project. As a result of these discussions, GRIC has identified five TCPs that could be affected by construction of the South

Mountain Freeway and has developed treatment plans to mitigate and/or eliminate potential adverse effects that could result from the undertaking.

To protect confidential information associated with the TCPs, the evaluation reports and treatment plans have been provided to only SHPO and GRIC-THPO. Information regarding the identification, evaluation, and treatment of the TCPs is being provided to other consulting parties in a technical summary report entitled *Traditional Cultural Property Evaluations for the 202L, South Mountain Transportation Corridor EIS & L/DCR Project, Maricopa County, Arizona* (HDR 2012), which is enclosed for your review and comment. This letter provides a summary of the TCP consultation for the project.

Consulting parties receiving the TCP technical summary include the Bureau of Indian Affairs and City of Phoenix, who have jurisdiction over the resources, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribes, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Nation, the San Juan Southern Paiute, the Tohono O’odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, and the Yavapai-Apache Nation.

During the initial Class III survey for the project, GRIC-CRMP identified ten properties as places of cultural importance that could potentially qualify as eligible for listing on the National Register of Historic Places (NRHP) as TCPs: the South Mountains; two prehistoric Hohokam village sites, AZ T:12:9 (ASM) (Villa Buena) and AZ T:12:52 (ASM) (Pueblo del Alamo); two petroglyph sites, AZ T:12:198 (ASM) and AZ T:12:208 (ASM); four trail sites, AZ T:12:197 (ASM), AZ T:12:201 (ASM), AZ T:12:207 (ASM), and AZ T:12:211 (ASM); and one archaeological site with a shrine, AZ T:12:112 (ASM). The report, entitled *A Class III Cultural Resource Survey of Five Alternative Alignments in the South Mountain Freeway Corridor Study Area, Maricopa County, Arizona* (Darling 2005), was provided in prior consultation.

At the request of FHWA and ADOT, HDR Engineering, Inc. (HDR), performed an NRHP evaluation of the ten potential TCPs. The results were provided in a report titled *An Evaluation of Traditional Cultural Properties for the 202L, South Mountain Transportation Corridor EIS & L/DCR Project, Maricopa County, Arizona* (Brodbeck 2012). To protect confidential information associated with TCPs, the report was sent to only SHPO and GRIC-THPO for review. Based on the results, and continuing discussion with GRIC-THPO and SHPO, FHWA determined that:

- the South Mountains were eligible for listing in the NRHP under Criteria A and B as a TCP
- AZ T:12:9 (ASM) (Villa Buena), AZ T:12:52 (ASM) (Pueblo del Alamo), AZ T:12:112 (ASM), and AZ T:12:198 (ASM) were eligible for listing in the NRHP under Criterion A as TCPs and under Criterion D as archaeological sites
- AZ T:12:197 (ASM) and AZ T:12:198 (ASM) were also NRHP-eligible under Criterion A as contributors to the South Mountains TCP

- AZ T:12:201 (ASM), AZ T:12:207 (ASM), AZ T:12:208 (ASM), and AZ T:12:211 (ASM) were eligible for listing in the NRHP under Criterion D as archaeological sites and not as TCPs

SHPO and GRIC-THPO concurred with FHWA’s eligibility determinations (Jacobs [SHPO] to Petty [FHWA] May 15, 2012; Lewis [GRIC-THPO] to Petty [FHWA] July 3, 2012).

Through ongoing Section 106 consultations, primarily through a series of discussions and meetings, FHWA, ADOT, and GRIC developed options for mitigating adverse effects on the TCPs. As a result of those discussions, avoidance alternatives were developed for two of the TCPs, a petroglyph site [AZ T:12:198 (ASM)] and a shrine site [AZ T:12:112 (ASM)]. They will now be avoided by project alternatives; therefore, there will be no direct impacts on these sites.

The South Mountains TCP cannot be avoided by project alternatives; therefore, a treatment plan that presents measures to mitigate potential adverse effects of the South Mountain Freeway project on the South Mountains TCP was developed by GRIC-CRMP entitled *South Mountain Freeway (SR 202L) Traditional Uses and Cultural Significance of Muhadagi Doag (South Mountain) Evaluation of Traditional Property and Adverse Effects of Transportation Corridor Development* (Darling 2009). SHPO and GRIC-THPO concurred with the adequacy of the South Mountain TCP mitigation plan (Jacobs [SHPO] to Petty [FHWA] May 15, 2012; Lewis [GRIC-THO] to Petty [FHWA] July 3, 2012).

Because it may not be possible to avoid Villa Buena and/or Pueblo del Alamo during freeway construction, FHWA proposed that an alternative strategy be adopted to prevent potential adverse effects to these two sites as they pertain to Criterion A of the NRHP. At the request of FHWA, GRIC-CRMP prepared a TCP enhancement plan proposal for the two sites, entitled *South Mountain Freeway (SR 202L) Traditional Cultural Property Enhancement and Management Planning for Villa Buena (AZ T:12:9 [ASM]) and Pueblo del Alamo (AZ T:12:52 [ASM])* (Darling and Loendorf 2012), which was provided to SHPO and GRIC-THPO for review and comment. This document proposes that upon completion of the EIS review process, the TCP enhancement plan be developed and implemented, which would ensure the following:

- preparation of the site(s) and people for anticipated ground disturbance include traditional religious activities, exhibits and outreach, tribal consultation, cultural sensitivity training, and the projection of equivalent sites and sacred landscapes
- development of Programmatic Solutions for preservation, restoration, and perpetuation of the roles of Villa Buena and Pueblo del Alamo in O’odham culture and history


Cultural (TCP) enhancement purposes to elevate O’odham knowledge and awareness of these two sites so that any negative impact on their “presence” in O’odham cultural and history—the loss of connections, or of place, in traditional culture—are addressed prior to, during, and after freeway construction, and as part of project planning. Enhancement does not address or replace requirements for data recovery pertaining to adverse effects on Villa Buena or Pueblo del Alamo

with regard to their eligibility under Criterion D of the NRHP. However, through implementation of the enhancement plan proposal developed by GRIC-CRMP, it is believed that the potential for adverse effects on these two sites under Criterion A will be eliminated. SHPO and GRIC-THPO concurred with the adequacy of the TCP enhancement plan proposal and that its implementation would eliminate adverse effects on Villa Buena and Pueblo del Alamo under Criterion A (Lewis [GRIC-THPO] to Petty [FHWA] October 22, 2012; Jacobs [SHPO] to Petty [FHWA] October 25, 2012).

Based on the above discussion, FHWA and GRIC have agreed that the proposed South Mountain Freeway would adversely affect those characteristics that contribute to the NRHP eligibility of the South Mountains TCP under Criteria A and B, and that the project would not adversely affect the characteristics that contribute to the NRHP eligibility of the Villa Buena, Pueblo del Alamo, AZ T:12:112 (ASM), and AZ T:12:198 (ASM) TCPs under Criterion A. Furthermore, FHWA has determined that a finding of “adverse effect” for the overall project remains appropriate.

Please review the information provided in this letter and the enclosed technical summary report. If you agree with the adequacy of the report and FHWA’s determinations of project effect, NRHP eligibility, and management recommendations, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact Linda Davis at 602-712-8636 or at ldavis2@azdot.gov.

Sincerely yours,


for
Karla S. Petty
Division Administrator

Signature for Navajo Nation Concurrence
NH-202-D(ADY)

Date

Enclosure



THE
NAVAJO
NATION

Historic Preservation Department, POB 4950, Window Rock, AZ 86515 • PH: 928.871-7198 • FAX: 928.871.7886

BEN SHELLY
PRESIDENT



REX LEE JIM
VICE-PRESIDENT

APR 1 - 2013

March 20, 2013

Karla S Petty, Division Administrator
U.S. Department of Transportation
Arizona Division
4000 N Central Ave.
Suite 1500
Phoenix, AZ 85012-3500

Dear Ms. Petty:

The Navajo Nation Historic Preservation Department-Traditional Culture Program (NNHPD-TCP) is in receipt of the proposed project regarding technical studies in support of the Environmental Impact Statement for the 202L, South Mountain Freeway, EIS and Location/Design Concept Report project, Phoenix, Arizona.

After reviewing your consultation documents, NNHPD-TCP has concluded the proposed undertaking/project area **will not impact** Navajo traditional cultural resources. The NNHPD-TCP, on behalf of the Navajo Nation has no concerns at this time.

However, the determination made by the NNHPD-TCP does not necessarily mean that the Navajo Nation has no interest or concerns with the proposed project. If the proposed project inadvertently discovers habitation sites, plant gathering areas, human remains and objects of cultural patrimony, the NNHPD-TCP request that we be notified respectively in accordance with the Native American Graves Protection and Repatriation Act (NAGPRA). *The Navajo Nation claims cultural affiliation to all Anasazi people (periods from Archaic to Pueblo IV) of the southwest. The Navajo Nation makes this claim through Navajo oral history and ceremonial history, which has been documented as early as 1880 and taught from generation to generations.*

The NNHPD-TCP appreciates the U.S. Department of Transportation’s consultation efforts, pursuant to 36 CFR Pt. 800.1 (c)(2)(iii). Should you have any additional concerns and/or questions do not hesitate to contact me electronically at tony@navajohistoricpreservation.org or telephone at 928-871-7750.

Sincerely,


Tony H. Joe, Jr., Supervisory Anthropologist (Section 106 Consultation) Navajo Nation Historic Preservation Department-Traditional Culture Program

TCP
cc: 13-141
Office File/Chrono



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January 31, 2013

In Reply Refer To:
NH-202-D(ADY)
HOP-AZ

NH-202-D(ADY)
TRACS No. 202L MA 054 H5764 01C
202L, South Mountain Freeway, DCR and EIS
Continuing Section 106 Consultation
Traditional Cultural Properties

Mr. Peter Yucupicio, Chairman
Pascua Yaqui Tribe
7474 South Camino de Oeste
Tucson, Arizona 85757

Dear Chairman Yucupicio:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are continuing technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS and Location/Design Concept Report project. The EIS addresses alternative alignments for the proposed South Mountain Freeway, which would extend around the southern side of South Mountains from Interstate 10 (I-10) in west Chandler to I-10 in west Phoenix. The project would be built entirely on new right-of-way (ROW). As this project employs federal funds, it is considered an undertaking subject to Section 106 review. Because alternatives are still under development, land ownership of the project area is not yet known.

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2

Mountain Freeway and has developed treatment plans to mitigate and/or eliminate potential adverse effects that could result from the undertaking.

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At the request of FHWA and ADOT, HDR Engineering, Inc. (HDR), performed an NRHP evaluation of the ten potential TCPs. The results were provided in a report titled *An Evaluation of Traditional Cultural Properties for the 202L, South Mountain Transportation Corridor EIS & L/DCR Project, Maricopa County, Arizona* (Brodbeck 2012). To protect confidential information associated with TCPs, the report was sent to only SHPO and GRIC-THPO for review. Based on the results, and continuing discussion with GRIC-THPO and SHPO, FHWA determined that:

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The South Mountains TCP cannot be avoided by project alternatives; therefore, a treatment plan that presents measures to mitigate potential adverse effects of the South Mountain Freeway project on the South Mountains TCP was developed by GRIC-CRMP entitled *South Mountain Freeway (SR 202L) Traditional Uses and Cultural Significance of Muhadagi Doag (South Mountain) Evaluation of Traditional Property and Adverse Effects of Transportation Corridor Development* (Darling 2009). SHPO and GRIC-THPO concurred with the adequacy of the South Mountain TCP mitigation plan (Jacobs [SHPO] to Petty [FHWA] May 15, 2012; Lewis [GRIC-THO] to Petty [FHWA] July 3, 2012).

Because it may not be possible to avoid Villa Buena and/or Pueblo del Alamo during freeway construction, FHWA proposed that an alternative strategy be adopted to prevent potential adverse effects to these two sites as they pertain to Criterion A of the NRHP. At the request of FHWA, GRIC-CRMP prepared a TCP enhancement plan proposal for the two sites, entitled *South Mountain Freeway (SR 202L) Traditional Cultural Property Enhancement and Management Planning for Villa Buena (AZ T:12:9 [ASM]) and Pueblo del Alamo (AZ T:12:52 [ASM])* (Darling and Loendorf 2012), which was provided to SHPO and GRIC-THPO for review and comment. This document proposes that upon completion of the EIS review process, the TCP enhancement plan be developed and implemented, which would ensure the following:

- preparation of the site(s) and people for anticipated ground disturbance include traditional religious activities, exhibits and outreach, tribal consultation, cultural sensitivity training, and the projection of equivalent sites and sacred landscapes
- development of Programmatic Solutions for preservation, restoration, and perpetuation of the roles of Villa Buena and Pueblo del Alamo in O’odham culture and history

Cultural (TCP) enhancement purposes to elevate O’odham knowledge and awareness of these two sites so that any negative impact on their “presence” in O’odham cultural and history—the loss of connections, or of place, in traditional culture—are addressed prior to, during, and after freeway construction, and as part of project planning. Enhancement does not address or replace requirements for data recovery pertaining to adverse effects on Villa Buena or Pueblo del Alamo with regard to their eligibility under Criterion D of the NRHP. However, through implementation

of the enhancement plan proposal developed by GRIC-CRMP, it is believed that the potential for adverse effects on these two sites under Criterion A will be eliminated. SHPO and GRIC-THPO concurred with the adequacy of the TCP enhancement plan proposal and that its implementation would eliminate adverse effects on Villa Buena and Pueblo del Alamo under Criterion A (Lewis [GRIC-THPO] to Petty [FHWA] October 22, 2012; Jacobs [SHPO] to Petty [FHWA] October 25, 2012).

Based on the above discussion, FHWA and GRIC have agreed that the proposed South Mountain Freeway would adversely affect those characteristics that contribute to the NRHP eligibility of the South Mountains TCP under Criteria A and B, and that the project would not adversely affect the characteristics that contribute to the NRHP eligibility of the Villa Buena, Pueblo del Alamo, AZ T:12:112 (ASM), and AZ T:12:198 (ASM) TCPs under Criterion A. Furthermore, FHWA has determined that a finding of “adverse effect” for the overall project remains appropriate.

Please review the information provided in this letter and the enclosed technical summary report. If you agree with the adequacy of the report and FHWA’s determinations of project effect, NRHP eligibility, and management recommendations, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact Linda Davis at 602-712-8636 or at ldavis2@azdot.gov.

Sincerely yours,


for
Karla S. Petty
Division Administrator

Signature for Pascua Yaqui Tribe Concurrence
NH-202-D(ADY)

Date

Enclosure

cc:
Rolando Flores, Assistant Tribal Attorney General, 4725 West Calle Tetakusim, Building B
Tucson, AZ 85757 (with enclosure)
Veronica La Motte Darnell, 4725 West Calle Tetakusim, Building B, Tucson, AZ 85757 (with enclosure)



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January 31, 2013

In Reply Refer To:
NH-202-D(ADY)
HOP-AZ

NH-202-D(ADY)
TRACS No. 202L MA 054 H5764 01C
202L, South Mountain Freeway, DCR and EIS
Continuing Section 106 Consultation
Traditional Cultural Properties

Ms. May Preston, President
San Juan Southern Paiute
P.O. Box 1989
Tuba City, Arizona 86045

Dear President Preston:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are continuing technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS and Location/Design Concept Report project. The EIS addresses alternative alignments for the proposed South Mountain Freeway, which would extend around the southern side of South Mountains from Interstate 10 (I-10) in west Chandler to I-10 in west Phoenix. The project would be built entirely on new right-of-way (ROW). As this project employs federal funds, it is considered an undertaking subject to Section 106 review. Because alternatives are still under development, land ownership of the project area is not yet known.

In accordance with the National Historic Preservation Act (36 CFR 800.4), which requires federal agencies to take into account the effects of their undertakings on historic properties, FHWA and ADOT have been performing cultural resources studies and consultations with Native American tribes to identify concerns regarding historic properties of traditional, religious, cultural, or historic importance. In prior consultation, the Gila River Indian Community (GRIC) expressed concern regarding the effects of the project on several traditional cultural properties (TCPs). The other southern tribes, Ak-Chin Indian Community, the Tohono O’odham Nation, and the Salt River Pima-Maricopa Indian Community, have deferred to GRIC to take the lead in Section 106 consultation regarding the TCPs. In response, FHWA and ADOT have facilitated a continuing open dialogue with GRIC’s Cultural Resources Management Program (GRIC-CRMP) and Tribal Historic Preservation Office (GRIC-THPO) regarding the identification and evaluation of TCPs as they pertain to the South Mountain Freeway project. As a result of these discussions, GRIC has identified five TCPs that could be affected by construction of the South

Mountain Freeway and has developed treatment plans to mitigate and/or eliminate potential adverse effects that could result from the undertaking.

To protect confidential information associated with the TCPs, the evaluation reports and treatment plans have been provided to only SHPO and GRIC-THPO. Information regarding the identification, evaluation, and treatment of the TCPs is being provided to other consulting parties in a technical summary report entitled *Traditional Cultural Property Evaluations for the 202L, South Mountain Transportation Corridor EIS & L/DCR Project, Maricopa County, Arizona* (HDR 2012), which is enclosed for your review and comment. This letter provides a summary of the TCP consultation for the project.

Consulting parties receiving the TCP technical summary include the Bureau of Indian Affairs and City of Phoenix, who have jurisdiction over the resources, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribes, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Nation, the San Juan Southern Paiute, the Tohono O’odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, and the Yavapai-Apache Nation.

During the initial Class III survey for the project, GRIC-CRMP identified ten properties as places of cultural importance that could potentially qualify as eligible for listing on the National Register of Historic Places (NRHP) as TCPs: the South Mountains; two prehistoric Hohokam village sites, AZ T:12:9 (ASM) (Villa Buena) and AZ T:12:52 (ASM) (Pueblo del Alamo); two petroglyph sites, AZ T:12:198 (ASM) and AZ T:12:208 (ASM); four trail sites, AZ T:12:197 (ASM), AZ T:12:201 (ASM), AZ T:12:207 (ASM), and AZ T:12:211 (ASM); and one archaeological site with a shrine, AZ T:12:112 (ASM). The report, entitled *A Class III Cultural Resource Survey of Five Alternative Alignments in the South Mountain Freeway Corridor Study Area, Maricopa County, Arizona* (Darling 2005), was provided in prior consultation.

At the request of FHWA and ADOT, HDR Engineering, Inc. (HDR), performed an NRHP evaluation of the ten potential TCPs. The results were provided in a report titled *An Evaluation of Traditional Cultural Properties for the 202L, South Mountain Transportation Corridor EIS & L/DCR Project, Maricopa County, Arizona* (Brodbeck 2012). To protect confidential information associated with TCPs, the report was sent to only SHPO and GRIC-THPO for review. Based on the results, and continuing discussion with GRIC-THPO and SHPO, FHWA determined that:

- the South Mountains were eligible for listing in the NRHP under Criteria A and B as a TCP
- AZ T:12:9 (ASM) (Villa Buena), AZ T:12:52 (ASM) (Pueblo del Alamo), AZ T:12:112 (ASM), and AZ T:12:198 (ASM) were eligible for listing in the NRHP under Criterion A as TCPs and under Criterion D as archaeological sites
- AZ T:12:197 (ASM) and AZ T:12:198 (ASM) were also NRHP-eligible under Criterion A as contributors to the South Mountains TCP

- AZ T:12:201 (ASM), AZ T:12:207 (ASM), AZ T:12:208 (ASM), and AZ T:12:211 (ASM) were eligible for listing in the NRHP under Criterion D as archaeological sites and not as TCPs

SHPO and GRIC-THPO concurred with FHWA’s eligibility determinations (Jacobs [SHPO] to Petty [FHWA] May 15, 2012; Lewis [GRIC-THPO] to Petty [FHWA] July 3, 2012).

Through ongoing Section 106 consultations, primarily through a series of discussions and meetings, FHWA, ADOT, and GRIC developed options for mitigating adverse effects on the TCPs. As a result of those discussions, avoidance alternatives were developed for two of the TCPs, a petroglyph site [AZ T:12:198 (ASM)] and a shrine site [AZ T:12:112 (ASM)]. They will now be avoided by project alternatives; therefore, there will be no direct impacts on these sites.

The South Mountains TCP cannot be avoided by project alternatives; therefore, a treatment plan that presents measures to mitigate potential adverse effects of the South Mountain Freeway project on the South Mountains TCP was developed by GRIC-CRMP entitled *South Mountain Freeway (SR 202L) Traditional Uses and Cultural Significance of Muhadagi Doag (South Mountain) Evaluation of Traditional Property and Adverse Effects of Transportation Corridor Development* (Darling 2009). SHPO and GRIC-THPO concurred with the adequacy of the South Mountain TCP mitigation plan (Jacobs [SHPO] to Petty [FHWA] May 15, 2012; Lewis [GRIC-THO] to Petty [FHWA] July 3, 2012).

Because it may not be possible to avoid Villa Buena and/or Pueblo del Alamo during freeway construction, FHWA proposed that an alternative strategy be adopted to prevent potential adverse effects to these two sites as they pertain to Criterion A of the NRHP. At the request of FHWA, GRIC-CRMP prepared a TCP enhancement plan proposal for the two sites, entitled *South Mountain Freeway (SR 202L) Traditional Cultural Property Enhancement and Management Planning for Villa Buena (AZ T:12:9 [ASM]) and Pueblo del Alamo (AZ T:12:52 [ASM])* (Darling and Loendorf 2012), which was provided to SHPO and GRIC-THPO for review and comment. This document proposes that upon completion of the EIS review process, the TCP enhancement plan be developed and implemented, which would ensure the following:

- preparation of the site(s) and people for anticipated ground disturbance include traditional religious activities, exhibits and outreach, tribal consultation, cultural sensitivity training, and the projection of equivalent sites and sacred landscapes
- development of Programmatic Solutions for preservation, restoration, and perpetuation of the roles of Villa Buena and Pueblo del Alamo in O’odham culture and history


Cultural (TCP) enhancement purposes to elevate O’odham knowledge and awareness of these two sites so that any negative impact on their “presence” in O’odham cultural and history—the loss of connections, or of place, in traditional culture—are addressed prior to, during, and after freeway construction, and as part of project planning. Enhancement does not address or replace requirements for data recovery pertaining to adverse effects on Villa Buena or Pueblo del Alamo with regard to their eligibility under Criterion D of the NRHP. However, through implementation

of the enhancement plan proposal developed by GRIC-CRMP, it is believed that the potential for adverse effects on these two sites under Criterion A will be eliminated. SHPO and GRIC-THPO concurred with the adequacy of the TCP enhancement plan proposal and that its implementation would eliminate adverse effects on Villa Buena and Pueblo del Alamo under Criterion A (Lewis [GRIC-THPO] to Petty [FHWA] October 22, 2012; Jacobs [SHPO] to Petty [FHWA] October 25, 2012).

Based on the above discussion, FHWA and GRIC have agreed that the proposed South Mountain Freeway would adversely affect those characteristics that contribute to the NRHP eligibility of the South Mountains TCP under Criteria A and B, and that the project would not adversely affect the characteristics that contribute to the NRHP eligibility of the Villa Buena, Pueblo del Alamo, AZ T:12:112 (ASM), and AZ T:12:198 (ASM) TCPs under Criterion A. Furthermore, FHWA has determined that a finding of “adverse effect” for the overall project remains appropriate.

Please review the information provided in this letter and the enclosed technical summary report. If you agree with the adequacy of the report and FHWA’s determinations of project effect, NRHP eligibility, and management recommendations, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact Linda Davis at 602-712-8636 or at ldavis2@azdot.gov.

Sincerely yours,


for Karla S. Petty
Division Administrator

Signature for Fort San Juan Southern Paiute Concurrence Date
NH-202-D(ADY)

Enclosure



U.S. Department
of Transportation
**Federal Highway
Administration**

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January 31, 2013

In Reply Refer To:
NH-202-D(ADY)
HOP-AZ

NH-202-D(ADY)
TRACS No. 202L MA 054 H5764 01C
202L, South Mountain Freeway, DCR and EIS
Continuing Section 106 Consultation
Traditional Cultural Properties

Mr. Terry Rambler, Chairman
San Carlos Apache Tribe
P.O. Box 0
San Carlos, Arizona 85550

Dear Chairman Rambler:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are continuing technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS and Location/Design Concept Report project. The EIS addresses alternative alignments for the proposed South Mountain Freeway, which would extend around the southern side of South Mountains from Interstate 10 (I-10) in west Chandler to I-10 in west Phoenix. The project would be built entirely on new right-of-way (ROW). As this project employs federal funds, it is considered an undertaking subject to Section 106 review. Because alternatives are still under development, land ownership of the project area is not yet known.

In accordance with the National Historic Preservation Act (36 CFR 800.4), which requires federal agencies to take into account the effects of their undertakings on historic properties, FHWA and ADOT have been performing cultural resources studies and consultations with Native American tribes to identify concerns regarding historic properties of traditional, religious, cultural, or historic importance. In prior consultation, the Gila River Indian Community (GRIC) expressed concern regarding the effects of the project on several traditional cultural properties (TCPs). The other southern tribes, Ak-Chin Indian Community, the Tohono O'odham Nation, and the Salt River Pima-Maricopa Indian Community, have deferred to GRIC to take the lead in Section 106 consultation regarding the TCPs. In response, FHWA and ADOT have facilitated a continuing open dialogue with GRIC's Cultural Resources Management Program (GRIC-CRMP) and Tribal Historic Preservation Office (GRIC-THPO) regarding the identification and evaluation of TCPs as they pertain to the South Mountain Freeway project. As a result of these discussions, GRIC has identified five TCPs that could be affected by construction of the South

2

Mountain Freeway and has developed treatment plans to mitigate and/or eliminate potential adverse effects that could result from the undertaking.

To protect confidential information associated with the TCPs, the evaluation reports and treatment plans have been provided to only SHPO and GRIC-THPO. Information regarding the identification, evaluation, and treatment of the TCPs is being provided to other consulting parties in a technical summary report entitled *Traditional Cultural Property Evaluations for the 202L, South Mountain Transportation Corridor EIS & L/DCR Project, Maricopa County, Arizona* (HDR 2012), which is enclosed for your review and comment. This letter provides a summary of the TCP consultation for the project.

Consulting parties receiving the TCP technical summary include the Bureau of Indian Affairs and City of Phoenix, who have jurisdiction over the resources, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribes, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Nation, the San Juan Southern Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, and the Yavapai-Apache Nation.

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At the request of FHWA and ADOT, HDR Engineering, Inc. (HDR), performed an NRHP evaluation of the ten potential TCPs. The results were provided in a report titled *An Evaluation of Traditional Cultural Properties for the 202L, South Mountain Transportation Corridor EIS & L/DCR Project, Maricopa County, Arizona* (Brodbeck 2012). To protect confidential information associated with TCPs, the report was sent to only SHPO and GRIC-THPO for review. Based on the results, and continuing discussion with GRIC-THPO and SHPO, FHWA determined that:

- the South Mountains were eligible for listing in the NRHP under Criteria A and B as a TCP
- AZ T:12:9 (ASM) (Villa Buena), AZ T:12:52 (ASM) (Pueblo del Alamo), AZ T:12:112 (ASM), and AZ T:12:198 (ASM) were eligible for listing in the NRHP under Criterion A as TCPs and under Criterion D as archaeological sites
- AZ T:12:197 (ASM) and AZ T:12:198 (ASM) were also NRHP-eligible under Criterion A as contributors to the South Mountains TCP